

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 07 CR 789
)	
DAVID ESTRADA ,)	Judge John Grady
)	
Defendant.)	

**DEFENDANT DAVID ESTRADA'S STATEMENT
OF COMPLIANCE WITH LOCAL RULE 16.1**

The defendant, David Estrada, by and through his attorney, Timothy P. O'Connor, pursuant to Local Criminal Rule 16.1, states as follows:

1. A formal 16.1 conference was held in this case on January 3, 2008.
2. The government, through its attorney, Michael Ferrara, has disclosed to defense counsel what it represents is a full disclosure of the 16.1 material within its possession. Delivery of these materials was made by the United States Attorney's Office on January 7, 2008 and in two subsequent mailings to defense counsel.
3. Counsel for the government has indicated that he is unaware of any evidence favorable to the defendant.
4. Counsel for the government has acknowledged the government's continuing obligation to make all disclosures required by Rule 16 of the Federal Rules of Criminal Procedure, Local Criminal Rule 16.1 and Brady v. Maryland, 373 U.S. 83 (1963).
5. Counsel for the government has agreed to provide the defendant with notice of its intention to use other crimes, wrongs or acts evidence, pursuant to Federal Rule of Evidence 404(b), two weeks prior to trial.

6. Counsel for the government has agreed to file any Santiago proffer two weeks prior to trial, in the event the government seeks to introduce any co-conspirator statements pursuant to FRE 801(d)(2)(E).

7. Counsel for the government has agreed to disclose, pursuant to Rule 16(a)(1)(E), Fed. R. Crim. P., the identity of any expert witnesses it intends to call and a written summary of the testimony that the government intends to use, two weeks prior to trial.

8. Counsel for the government has agreed to direct all personnel involved in the investigation of this matter to preserve all notes, whether of witness interviews or otherwise, taken during the investigation.

9. Counsel for the government has agreed to produce, to the extent not already produced, all Giglio and Jencks Act material, two weeks prior to trial.

Date: February 27, 2008

Respectfully submitted,

DAVID P. ESTRADA

By: s/ Timothy P. O'Connor
One Of His Attorneys

Timothy P. O'Connor
MEYER & O'CONNOR, LLC
Suite 2210
20 South Clark Street
Chicago, IL 60603
312-346-9000

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he caused a copy of the foregoing DEFENDANT DAVID ESTRADA'S STATEMENT OF COMPLIANCE WITH LOCAL RULE 16.1 to be served upon

AUSA Michael Ferrar
United States Attorney's Office
219 S. Dearborn St.
Chicago, IL 60604

Matthew J. Madden
28th Floor
55 East Monroe
Chicago IL 60603

by electronic service and first class mail on this 27th day of February, 2008.

s/Timothy P. O'Connor